

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Heather Rene White
Debtor 1

MidFirst Bank
Movant(s)

v.

Heather Rene White

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:23-BK-02554-HWV

Matter: Motion for Relief from the Automatic Stay

Document No.

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Heather Rene White, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Upon information and belief, the averment as stated in Paragraph 4 is admitted.

5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 5; therefore, it is denied.

6. Upon information and belief, the averment as stated in Paragraph 6 are admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 are admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in Paragraph 9; therefore, they are denied.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, they are denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: April 3, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, April 3, 2025, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Denise Carlon, Esquire
KML Law Group
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire